Benchmark Ia.1.2: Issue draft of the CW Ongoing Services Standards for review and comments. Consult with external stakeholders for policy change recommendations.

Evidence of Completion: Summary report of recommendations received

| Quarter 3 Feedback Questionnaire | | |
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| Policy Topic | Gaps in policy or process? | Thoughts regarding this topic? |
| | Case Transition Process | (Section II. pg. 4-9) |
| WCHSA PAC 7/15/11 (23) NOTE: memo came out the morning of the meeting so many had not reviewed | No Comments | ■ No Comments |
| BRO 7/26/11 (14) | No Comments | No Comments |
| ICW Directors 7/27/11 (11) 09/27/11 (10) | No Comments | ■ No Comments |
| Perm. Consultants 7/28/11 (16) | ■ No Comments | Do the standards apply to adoption workers/contracted staff?—YES if adoption has not finalized. This will take significant training for contracted staff. Solidifies that private contract agency staff are workers in public child welfare system performing case management. |
| BMCW 8/2/11 Session 1 (20) | JJ for Milwaukee if kid is dually served by Mil county and BMCW, court orders BMCW to take case if JJ is done, need to improve transition. Role clarity in cases is critical. | Do not need a separate policy to separate disputes. Box page 6, like that this is linked to approval, this is a little bit difficult because IA does not have services, Family Case transfer is 90 days from TPC, IA staff held accountable for the assessment. This does not conflict with what we are trying to do. If OCM is not primary, the vender does not get paid, in |

| BMCW | Reiterated role clarity and issues from | the secondary roll—contract rule? Cannot delay the write up or short-cut information collection. Primary and Secondary assignment, who is ultimately responsible; it does not matter on what eWiSACWIS says.—work under secondary can be covered. Discussion about needed revisions to BMCW policy on |
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| 8/2/11 Session 2 (4) | morning. | page 8. |
| BMCW 8/2/11 Session 3 (29) | ■ No Comments | Inter county venue issues Jurisdictional issues about who is in charge Did see broader and allows for internal policies |
| WCHSA Directors 8/4/11 | No Comments | No Comments |
| Southern Region Sups 8/5/11 (24) | ICPC references before a parent moves to another state or move to; other states will not do anything if the family is not there. Pg. 6 top (1) remove grammar | When there are issues with venue still could be problematic Reference to court jurisdiction as what? On ICPC may not have gone to dispo, flush this out more. Family up and moves, then what; if you do not have jurisdiction. We made an access report for IL and the same thing in NV rather than ICPC since they will not get involved. We do not want to drop the case just so they can get services. |
| Southeastern Region Sups (16) 8/11/11 | ■ No Comments | 7 days from IA to 7 days to meet with family; 7 days seems too long to transfer (suggest 5 business days) Internally currently we have 2 day, practice can be quicker. |
| Northern Region Sups (21) 8/24/11 | ■ No Comments | ■ Formalizes what we have already done. |
| Western Region Sups (23) 9/2/11 | Would like it to be cleaner as in IA approval before transfersomething more specific about this. Either in process or anchors to | How would these be documented? Will there be a specific case note? Ongoing services vs. ongoing worker?some of this |

| Division of Safety | transfer Others thought this too directive since they assign OCM earlier in the case Ongoing sups don't know when IA's are completed—how can they know this? Could there be ewisacwis assignment when IA is approved automatically? Pg. 6 can you change from to "between" | would be the IA worker if it is has not been transferredall OHC stuff. Liked the clarity this provides. |
|---|---|--|
| and Permanence (24) 9/14/11 | state/county/contracted workers | • |
| Permanency Workgroup (22) 9/15/11 | No Comments | No Comments |
| Northeastern Region Sups (29) 9/22/11 | Concern about case plan being within 60 days of placement, the evaluation of the changes needed is not complete enough yet Change pieces by 6 months My workers will still do a new plan, noted there would be nothing to prohibit you from doing more Need clarifications when to go back to court when something changes—pieces vs. specifics or if parent agrees with new requirement | JJ area expectations. we have a file typing system will we have to put all of that into ewisacwis? NO only what is currently required CW Case more voluntary do we do safety? No, this is a formal policy for non-jurisdictional caseshelp they may need now we have to do more sacwisservices intake reports and gets assigned. There are 2 periods in 1st box on pg. 9 missed a period on page 40 last box. |
| WJCIA (20) 09/27/11 | ■ No Comments. | No Comments. |
| Emailed Comments | Applicability on JJ cases needs further clarification: Only required in placement cases ICWA only applies to JIPS not Del Also applies to JJ cases where CHIPS jurisdiction/safety issues are also present— | This is very prescriptive in terms of who is responsible for what and when—may require some agencies to change current practice/policies |

| | | Current to date of 9/30/11 |
|--------------------------------------|---|---|
| | between professionals or with family | |
| Assessing | Evaluating and Confirming | Safety in Unlicensed and Licensed |
| 11550551115 | Placement Settings (Atta | • |
| WCHSA PAC 7/15/11 | No Comments | Concern noted by JJ sups that this is a new requirement, reiterated this is a federal requirement |
| BRO 7/26/11 | No Comments | ■ No Comments |
| ICW Directors 7/27/11 09/27/11 | No Comments | No Comments |
| Permanency Consultants 7/28/11 | ■ NO Comments | This may assist when there are concerns with supervision issues post TPR to ground removal decisions Concern about removal of safety plans from FH's, what about relative placements where the child has been there for a very long time? Like the distinction and reframe of safety vs. licensure; clarifies ambiguity |
| BMCW | • 24 hours or within 2 days of seeing the | No Comments |
| 8/2/11 Session 1 BMCW | child/family p. 152 box and timeframes No Comments | Does some of this replace OHC safety-Yes |
| 8/2/11 Session 2 | - No Comments | Does some of this replace OHC safety-1 es At placement is IA doing this same requirement |
| BMCW | Visitation and safety, especially for relatives | Will this be a part of Integrated Case Plan |

| | danger threats and Family Interaction Plan | |
|------------------------------------|--|--|
| WCHSA Directors 8/4/11 | No Comments | No Comments |
| Southern Region Sups 8/5/11 | No Comments | Will there be a tickler at placement to trigger OHC safety assessment?—Yes |
| Southeastern Region Sups | ■ No Comments | 2 days is earlier for the current 5 days for licensed placements—this is a packed timeframe many things happen in the first 48 hours This can change the priority list of what is most urgent on the list With a placement case you lose a worker for a week, suggest 3 days would be better since it takes you past the point of court work Concern that this could compromise court work which if we are not adequate there, then whatwe lose jurisdiction. Could you add the background checks to licensing in Ch. 56?this would be in-line with the changes to child care? Add information and direction outside the box on how to accomplish the background checks |
| Northern Region Sups 8/24/11 | ■ Need to educate courts on safety threats | Will there be a training requirement for JJ workers now? They are not necessarily trained in this? FC reassessing safety every 6 months how does this coincide with licensing? Unlicensed homes in other countieshow do we get assistance with this? What about placements made without us and then us picking them up? Sometimes with relatives we assume they are safe and overlook safety plans Suggest providing sample questions |
| Western Region Sups 9/2/11 | ■ No Comments | CCAP prior to placement or within 2 daysconfusing? For all placements or just in-home? In-home vs. congregate |

| Division of Safety and Permanence 9/14/11 Permanency Workgroup 9/15/11 | No CommentsNo Comments | Please add some sample questions for congregate care settings How does carry and conceal law fit into p. 196? No Comments No Comments |
|---|---|--|
| Northeastern Region Sups 9/22/11 | Could this be modified to FH's who have not had placements for a period of time? What about when Pre-placement visits have occurred and the move is planful? Is this just for the caregivers or all household members? Difference between placements being "safe" overall vs. "safe" for a particular childlicensing process should cover safety of home overall, ongoing standards should address safety of that child (i.e. checks on that specific child). Do we always have to assess P. 155 group or RCC's prior to placement? We do not require that for unlicensed homes? Having a license should give some safe guards/basic assurances, otherwise what's the license good for? | Background checks every 6 months or checks of data basis on forms for safety assessment to remind workers P. 152 unlicensed check within 24 hours There could be multiple checks for licensed families with multiple childrenis this necessary? Clarify outside of box how this information could be obtained. Take out sex offender registry check, CCAP every six months by supervising agency? P. 151 box redundant can just say "caseworker must assess safety as part of all OHC placements. |
| WJCIA 09/27/11 | Seems like too many background checks. | No Comments. |

| Emailed Comments | | The coordinators noted that if there were multiple children placed in the foster home you could run these checks several times a year. Question the need for the placing worker to redo all the checks for licensed homesCCAP, etc. This area is going to need considerable training. I know in our agency if the placed is licensed, that's all that is addressed in the perm plan. Since JJ workers also do placements, there is going to be a big learning curve for some of them that haven't been cross-trained in safety assessment. Possibly a training topic for partnerships. |
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| | Minor Parent Minor Child | (Section VI. Pg. 145) |
| WCHSA PAC 7/15/11 | No Comments | Very Receptive to this topic being included, clarifies a gray area |
| BRO 7/26/11 | No Comments | No Comments |
| ICW Directors 7/27/11 09/27/11 | No Comments | No Comments |
| Permanency Consultants 7/28/11 | No Comments | No Comments |
| BMCW 8/2/11 Session 1 | Add that this is with or without jurisdiction Not in care and the responsibility for in-home cases where a teen was pregnant, stay with the case until the baby is born All OHC cases, not just foster home settings | ■ No Comments |

| BMCW 8/2/11 Session 2 | ■ No Comments | Clarification around getting the order on the baby; could be a CW case, but not always automatically getting petition. Information about when not to get orders or what the services the minor child could access for services. |
|---|---|--|
| BMCW 8/2/11 Session 3 | Who can the baby be aroundcan the youth take the baby out partying?who has the authority if not on a court order? When a baby is not on a court order and leaves should there be minimal contact requirements? | ■ No Comments |
| WCHSA Directors 8/4/11 | No Comments | No Comments |
| Southern Region Sups 8/5/11 | Many times these are JJ cases not just CPS vs. CW modify the language Unborn child and then when the child is bornneed more firm guidance | Need more guidance on when the unborn child turns into one of these cases |
| Southeastern Region Sups 8/11/11 | No Comments | No Comments |
| Northern Region Sups 8/24/11 | No Comments | No Comments |
| Western Region Sups 9/2/11 | No Comments | ■ Change "these" in 1 st paragraph |
| Division of Safety and Permanence 9/14/11 | ■ No Comments | Would like to see something in terms of training for foster parents about this as well. |
| Permanency Workgroup 9/15/11 | No Comments | No Comments |
| Northeastern Region Sups | No Comments | Authority clarificationsAnyway to add jurisdictional language about who has |

| 9/22/11 | | jurisdiction of baby when placed out-of-county: who has responsibility for economic support, WIC, VPA, other benefits? Conditions of teen parent should include care of minor child if the minor child is not also on a court order P. 146 #1 in box seems redundant, we've already done all that by this point in the case with exception maybe of post-partum depression (role of other bio parent stated earlier in box) #3(d) infant won't need dental or mental health care Are we required to take legal jurisdiction of infant? i.e. place in OHC with minor parent? In-home CHIPS infant with minor child? |
|--------------------------------------|--|--|
| WJCIA | No Comments. | No Comments. |
| Emailed Comments | ■ No Comments | Documentation required at end: Is the child of minor parent's record to be a stand-alone (in SACWIS), as it is for kinship care cases? This is somewhat contradictory w/the opening paragraph that requires perm planning for the child that may be an individual plan or addressed in the minor parent's perm plan (which I think is preferable.) |
| | Permanency Planning (Throughout do | ocument / Section V. pg. 56-66) |
| WCHSA PAC 7/15/11 | No Comments | Staff will need significant training on IL being removed Concern about removal of IL and change to OPPLA—discussion about IL as a service, not permanence |
| Permanency Consultants 7/28/11 | No Comments | Happy about the removal of IL |
| ICW Directors 7/27/11 09/27/11 | No Comments | No Comments |
| BMCW 8/2/11 Session 1 | Safety services wanting IL as a service order or as part of the perm. Plan to participate in Transitional Living | 90% of Milwaukee cases would be concurrent We have tried extreme resistance from our courts at times. There must be work with outside stakeholders, judges. Safe permanent placement and this is how the child/family |

| | | functions; may not be enough to detain and subsequently come back to the agency. (Are we really talking safety or risk? If really not safe, then we likely have jurisdiction)—goes back to Access for court. |
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| BMCW 8/2/11 Session 2 | IL must be ordered as the goal as part of the perm. Plan to participate in Transitional Living with Ladd Lake Trial Reunification request from BMCW to court?—DA's what is the right way to do this. | Trial reunification, Mil is not doing Trial reunification request from BMCW for court?—DA's what is the right way; current lack of statutory authorityDA's say this is not an avenue for you to do this? |
| BMCW 8/2/11 Session 3 | No Comments. | Trial reunification, to have the authority in courts |
| WCHSA Directors 8/4/11 | No Comments | No Comments |
| Southern Region Sups 8/5/11 | What about when there is no family court order? | Do not agree that it is not reunification with the non-offending parent Make it clear that the PP is not required for the non-custodial parent Often times family court will not get involved if CPS is involved Example of the agreement with one CPS agency and their family courts to expedite changes to family court orders in these scenarios P. 62 increase information of placement with a parent and add clarification of what to do or not do in these situations |
| Southeastern Region Sups 8/11/11 | ■ No comments | Helpful May need to run by corp. counsel 1st, they may not like this Foster parents have been given this type of information and this supports what they have heard for years This is the right thing |
| Northern Region Sups | No Comments | Family court ideas—need guidance about this GAL's often take this on for us with family courts, circuit |

| 8/24/11 Western Region Sups 9/2/11 Division of Safety | No CommentsNo Comments | ct continues appointment until Family Court petition is through Hire outside counsel to assist families Informed paragraph on pg. 62 will be moved to safe case closure and guidance will be added. Include more information on transitioning to adoption |
|---|--|---|
| and Permanence 9/14/11 | - No Comments | Does this apply to all cases?—yes. |
| Permanency Workgroup 9/15/11 | Why do we also need a court report if all of the information is in the Permanency Plan? Contested cases could result in issues for Case planning | RE CT reportcould we expand statutory language to include both requirements for the current PP document that will be the case plan? Perm. Plan or Case planwould like to see the 6 month snapshots of progress remain in the plans so the development of the history of the case remains Would like to see the "why CW agencies are involved and safety issues" sooner in the plans, feel the current PP provides too much demographic information at the first page and must look several pages in before getting to the necessary information for a review. Would like some type of index in front that says what portions are on which page of the document to ease location of information during hearings/review of the document. Currently there is too much cutting and pasting and often times it does not make sense in the document. Would like the history and findings to read more like a story to tell us where we are at today. Would like to receive documents via email. Current document is too long and too redundant |
| Northeastern Region Sups 9/22/11 | P.62—explained changes coming P.61 pre-approved notice of 10 days prior to placement Trial reunification should be allowed with the other parent | ■ No comments |

| | P. 65 bottom box is confusinghelp prepare | |
|-------------------|---|---|
| | child by preparing child? | |
| | • Who does the transition for adoption? | |
| WJCIA 09/27/11 | No Comments. | ■ No Comments. |
| Emailed comments | Child Welfare Section (Sec | The agency must provide a copy of each revised plan that is filed with the court to the child's parent or guardian, to the child or the child's counsel, Guardian ad Litem (GAL) or Court Appointed Special Advocate (CASA), and to the district attorney or corporation counsel. The filed case plan is part of the dispositional order. For the changes listed above that the court issues orders on, there is no need to go back to court at that time for an additional revision to the case plan, as these orders shall be considered addendums to the dispositional order and includes the case plan. (pg. 30 and 53) Case plans have not been filed with Courts in the past. It is not considered a reunification if a child is removed from one parent and placed with another unless the other parent was also named in the original petition to the court and the child was removed from both parents. In cases where a child can be placed with the non-custodial parent, it is considered placement with a fit and willing relative and the agency continues to work with the non-custodial parent to obtain a family court order that supports the current situation. Until the family court order is modified, the child remains in out-of-home care and permanency planning efforts must continue. The agency shall not close its case until this process is completed. (pg. 62) This requirement will never fly as a parent is a parent and not a fit and willing relative (definition of parent under 48.12(13) Brings nice clarity to the timing and use of concurrent planning. tion IV. Pg. 36-56) |
| WCHSA PAC | No Comments | PP-Case Plan change needs to be clear for JJ staff |
| 7/15/11 | -10 - 0 - 0 - 0 - 0 - 0 - 0 - 0 - 0 - 0 | 12 |

| BRO 7/26/11 | No Comments | Incorporating the Juvenile Justice population into standards necessitates looking at eWiSACWIS to ensure that the changes in the case plan incorporate the Juvenile Justice population – group believes there will be push back from JJ population because they do not assess and evaluate when case planning (i.e. pushing a square peg through a round hole). |
|---|---|---|
| ICW Directors 7/27/11 09/27/11 | No Comments | ■ No Comments |
| Permanency Consultants 7/28/11 | No Comments | No Comments |
| BMCW 8/2/11 Session 1 | ■ Pg. 38 in-home is face-to-face monthly? Or do you mean contact monthly; but quarterly ¼ly? | • Wow, this is great! |
| BMCW 8/2/11 Session 2 | No Comments | claps |
| BMCW 8/2/11 Session 3 | No Comments | No Comments |
| WCHSA Directors 8/4/11 | No Comments | No Comments |
| Southern Region Sups 8/5/11 | No Comments | No Comments |
| Northern Region Sups 8/24/11 | Special Care and treatment kids who are placed, but we could not get in for reasons of CPS, clarify this—still as CPS case, not just the legal definition of which you follow | No Comments |
| Western Region Sups 9/2/11 | No Comments | No Comments |
| Division of Safety and Permanence 9/14/11 | ■ No Comments | Consider syncing definition of case types with ewisacwis definitions that have been created as we go along over the years Think about how we can use the same definitions for all |

| | | Current to date of 9/30/11 |
|--|--|--|
| | | case types and in defining them |
| | | Be consistent with how we identify these. |
| Permanency Workgroup 9/15/11 | No Comments | No Comments |
| Northeastern Region Sups 9/22/11 | P. 40—Connie has note P. 38 case worker contact P. 66 1st box, last bullet, programs and services may (please add may) include: All of these bullets on pg 66 will not apply to every child? | This is really broader than CHIPS Spec. care and tx if our jurisdiction is this, but it is really a CPS case, just do not have that distinct jurisdiction Non-CPS case starts under other types primary intervention is impending danger; be careful in how this is explained. |
| WJCIA 09/27/11 | No Comments. | No Comments. |
| Emailed comments | No Comments. No Comments. | Why are child welfare cases being included in on-going standards? Most of these cases are opened to provide voluntary services to families with all the additional documentation pieces, families will decline services? Why are JJ and JIPS cases being part of "Child Welfare" on-going standards (pg. 36)? Most counties do not enter their JJ cases (except out of home f-f notes) in eWiSACWIS? What is DOC's input? Thanks for having separate sections for CAN/CPS vs. Child Welfare/JJ, etc. I realize that you are aiming for an integrated case plan/perm plan, etc. and it requires CANS, but it seems that it should be clearer what documents and process will be covered by that (i.e., pg 46 additional requirements (CANS); pg 45 Planning/Devel. Goals—Perm/case plan? The global document is finally mentioned on page 46.) |

Overall, is there anything that you expected to be included in the Ongoing Services Standards that was not included?

- Guardianship venue issues & the utility of Ch. 54 guardianships with Ch. 48 cases... seek to limit Ch. 54 guardianships -WCHSA PAC
- Guardianship post TPR perm. Plans having all of the bio parent information-PC's
- Alternative response information?-PC's
- Language related to family team-SRSUPS
- Statutory change for sustaining care for kids after 18 to continue payment while still in school-SRSUPS
- P. 14 Face to face family interaction weekly basis, what about incarcerated parents?—explained guidance and this is mentioned in exception box-NSups
- Agency case worker? What about courtesy supervision cases? Pg. 24 only CPS cases not out-of-county placements—clarify—NSUPS
- P. 24 for "foster care" not all OHC contact 2 times per month for L3-5 kids in L3-5 FH placements—NSUPS
- Timeframes to issue all of this? Could you chunk out the new information and provide trainings before hand, ease in the implementation—WSUPS
- P. 64 why for payment cases, provide an example.-WSUPS
- Stronger emphasis on workers locating relatives earlier in the case and the emphasis of family connections.-Perm. Workgroup
- NYTD IL information, caseworkers do not seem aware of this requirement—Note: Chris Lenske has created something for CP—DSP
- COKC and transitioning case to voluntary how to change the display in ewisacwis (IV-E and "placement and care responsibility language"—DSP
- Guardianship only cases and the responsibilities between state and county staff-DSP
- Caseworker contact notes, required to touch every area at least once a month...different case note to prompt worker for safety items and perm.-NESUPS
- P. 40 1st box, last bullet, suggest rewording to "assess their commitment and ability..." the family may not be committed but have to be involved with us.—NESUPS
- Concern about 2x a month contact in Level 3-5 foster homes; explained this has always been requirement—WJCIA
- Concern noted about private CPA's not providing monthly contact documentation for counties to document in ewisacwis—WJCIA
- Pg 22: intact is one word, not 2 (In Home Safety Plan box)—email
- Cover page for Trial Reunification has a typo---reads Tribal Reunification—email

General Comments / Any Confusing Content?

- Training of contracted SNAP staff will be significant-PC's
- Like that QSR and Permanency language is woven throughout the document-PC's
- Will we have access to juvenile CCAP?-BMCW Session 3
- Make sure JJ sups see this as well –SRSUPS
- Like the feedback process—SERSUPS

- Could the case plan change to be the conditions for return in the CT order?—SERSUPS
- Waukesha has an addendum to CO that may be helpful—SERSUPS
- Placements with non-custodial parent—should move to case closure section along with encouragement to work with family courts; could there be direction from state courts office to clarify between circuit and family courts about this?—SERSUPS
- Bench guides and appendices for staff need to be added to standards—SERSUPS
- Will Alternative response be in standards?—NSUPS
- Caseload standards in here? Seems disingenuous to not provide these with all that is required.—NSUPS
- P.46 Mental Health Screen, what is this? Explained already part of the CANS tool algorithm.—NSUPS
- Modify case note for F2F with a template that assists worker with confirming safety/perm/well-being—WSUPS
- F2F still having problems getting case notes from CPA's and facilities...is there anything licensing or DCF can do to assist us with this?-WSUPS
- Relative placements and F2F ICPC cases, other states not wanting to give us contacts (issues with MN)—WSUPS
- Issues with two counties who have kids in care on separate orders, only shows up on one of our reports for F2F Contact-WSUPS
- Could we have ticklers for case note F2F documentation within 30 days?—WSUPS
- Like that all of this information is in one spot—WSUPS
- Suggest development of a quick reference guide for case flow or detailed appendices.—WSUPS
- Please reduce the documentation so workers have more time with families and less time with computers-perm. Workgroup
- Surprised to see 30 day allowance for face-to-face contact documentation-DSP
- Trial Reunification, consider how this could be modified to be applicable for JJ cases, Dane County uses TR/SC-DSP
- Make sure to include the definition of "placement and care" is on pg. 68, but ensure that it is in the glossary as well-DSP
- This will be a change not just to standards, but to case planning, workflow process, and agency management of cases—NESUPS
- Please get these done this time—NESUPS
- LOVE the integrated plan idea...a long time coming. Thanks for the opportunity to provide input and being involved in the process— NESUPS
- The parents' or caregivers' rights and responsibilities throughout the Ongoing Services and court processes with an emphasis on the temporary state of out-of-home care and the emotional and developmental impact of out-of-home care on children. (page 16) Clarify?—emailed comment
- When a child is assessed at a Level 3 or higher on the CANS and placed with an out-of-home care provider with a certification of 3 or higher, the supervising agency (county or CPA) must have face-to-face contact with the child bi-weekly. (pg. 24 and 48) Bi-weekly-twice a week or twice a month. Why would we have to have more face-to-face just based on CANS? We recently had a 2 month old that rated a Level 4 and we placed with a relative.—emailed comment.
- "Sibling" means a person who is a brother or sister of the child, whether by blood, marriage, or adoption including a person who was a brother or sister of a child before the person was adopted or parental right to the person were terminated. [Ref. s. 48.38(4)(br), Stats.] This definition is for the purpose of placement in out-of-home care or placement for adoption. We have been told by the courts that half-siblings and step-siblings do not fall under this definition.—emailed comment.
- Do we have enough clarity in the new standards about reviewing/revising the case plan and evaluations should conditions in the home change that might affect a child's safety that they MUST be updated? In looking at the current standards I think this area is not stressed enough.—

emailed comment

Pg 30 in box—ref last paragraph—will judges agree that case plan is part of the order and no revision of order is necessary?—emailed comment

My biggest concern is calling all this a "Standard"---it's more like a manual. When you call it a "standard" and have it this prescriptive, it becomes a lawsuit waiting to happen in a case where an unhappy customer hires an attorney out to prove "negligence" when every little detail in here could be held up for scrutiny as a "standard" to be followed exactly. The requirements for documentation are overwhelming to the point where a CPS worker should probably not have more than 5 families, especially if placement is involved. I can't imagine that budgets will cover that level of staffing in today's climate.—emailed comment